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**Workmen's Compensation—Injury by Fire from Smoking as Accident in Course of Employment.**—In *Dzikowska v. Superior Steel Co.*, in the Supreme Court of Pennsylvania, 103 Atl. 351, it was laid down that it is not unreasonable for workmen to smoke out of doors during intervals in their work where it does not interfere with their duties.

It was held that where an employee engaged in loading steel upon a railroad car, while awaiting the arrival of trucks with more steel, struck a match to light a cigarette, as the result of which his burlap apron, which was saturated with oil from the steel, caught on fire and he was fatally burned, an award of compensation to his dependents was properly made under Workmen's Compensation Law (§ 301), permitting a recovery for an "accident in the course of his employment." The opinion concludes:

"The evidence showed that the burlap apron worn by *Dzikowska* for the purpose of protecting his clothes while he was working, which was soaked with oil from the steel, first caught fire from the match and the flames communicated to the burlap wrappings on his arms, worn for the same purpose, and also oil soaked. If he had not worn these wrappings, or if they had not become unusually inflammable by reason of the work in which he was engaged for his employer, the accident would probably not have occurred. It is not unusual for men to strike matches on their trousers without thought of danger. The peril in the present case arose, or was at least greatly increased, by the use of burlap wrappings worn for the purposes of the workmen's employment, and their inflammable condition resulted directly from that employment. *Dzikowska* was, of course, negligent in striking the match upon his oil soaked clothes. But, under the Workmen's Compensation Act of 1915, contributory negligence on the part of the workmen is not a defense. The employer is liable for accidents in the course of employment, except for injuries 'intentionally self-inflicted,' or caused by an act of a third person intended to injure the workman for reasons personal to him."